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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**

**LAURA HANSON,**

Plaintiff,

v.

**STATE OF OREGON LEGISLATIVE  
ASSEMBLY,**

Defendant.

Case No. 3:21-CV-00780-SI

**PLAINTIFF'S OBJECTIONS TO  
DEFENDANT'S EXHIBITS**

EX. NO.	EXHIBIT DESCRIPTION	OBJECTION
203	[Hansen MSJ Dec. X3] ADA Accommodation form	No objection. Also Ex. 48.

EX. NO.	EXHIBIT DESCRIPTION	OBJECTION
204	Hanson BAARS-IV” Self-Report: Current Symptoms	Objection. This exhibit is cumulative of other evidence. There is no dispute that Plaintiff and Sen. Gelser had challenging communication and Plaintiff struggled with some tasks and expectations during her employment with Sen. Gelser and this triggered her to inquire about whether she had ADHD. Plaintiff does not dispute this document but asks that it be excluded as unnecessarily cumulative under Fed. R. Evid. 403. To the extent Defendant intends to offer this document to support the contention that terminating Plaintiff was a bad employee, that argument in itself demonstrates discrimination and should not be allowed under Fed. R. Evid. 408.
206	Nov. 12, 2019 Gelser Blouin-Hanson texts	Objection. Evidence regarding Plaintiff’s leave for her concussion is only offered as impermissible character evidence to show that Sen. Gelser allowed leave in the past and acted in conformance with that in December 2019. This should be excluded under Fed. R. Evid. 404.
207	Jan. 21, 2019-Jan. 5, 2020 Gelser Blouin-Hanson texts	Plaintiff does not generally object to the Hanson/Gelser texts, and many of these messages overlap with Ex. 5. Plaintiff does object to them being used to show Gelser acted in conformance with a character to allow leave, accommodate disabilities, or generally that Gelser or Plaintiff acted in conformance with character as prohibited by Fed. R. Evid. 404. These messages also have unredacted private constituent information and medical information of Sen. Gelser and her child that are irrelevant. Plaintiff reserves the right to make additional objections should Defendant introduce these messages for improper

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		purpose. Some of these messages overlap with Ex. 206.
208	Gelser Blouin-Hanson texts incl “toxic environment”	Objection. These appear to be the same as messages in Ex. 207 and are therefore cumulative. Fed. R. Evid. 403.
209	Sept. 30, 2019 “Sick this morning” e-mail string	Objection under Fed. R. Evid. 401 and 404. These emails are irrelevant and would only be used to show Gelser’s character and conformance with character. They should be excluded.
210	Dec. 18-29, 2019 Gelser Blouin-Hanson texts	Objection. These appear to be cumulative of Ex. 207.
211	Dec. 19, 2019 Mental Health Day text	Objection. This is an incomplete and misleading document. Page 1 appears to be the top of Ex. 11 and the second page is from page 2 of Ex. 7, except the color changes may mean it is from a different date. Providing this exhibit out of context would be misleading to the jury. It is also inaccurate to call these a “text.” This document should not be offered to the jury. Fed. R. Evid. 403.
212	Hanson record of leave taken 2 <sup>nd</sup> half 2019	Objection. Lack of foundation.
213	Hanson diagnosis certification	No objection. Also Ex. 28.
214	Dec. 31, 2019 Gelser Blouin e-mail re Hanson concerns	Objection. Cumulative of Ex. 218.
215	Dec. 31, 2019 Hanson to Knieling e-mail	Objection. Cumulative of Ex. 218.
216	House Concurrent Resolution 20 amending LBPR 27	No objection. Also Ex. 3.

EX. NO.	EXHIBIT DESCRIPTION	OBJECTION
217	House Concurrent Resolution 221 further amending LBPR 27	No objection. Also Ex. 34.
218	Dec. 31, 2019-Jan. 2, 2021 Hanson-Knieling e-mail string	No objection. Also Ex. 17.
219	Jan 6, 2020 Knieling to Hanson re administrative leave	No objection. Also Ex. 26.
220	Jan 5, 2020 Hanson e-mail to Knieling re “Confused about process”	No objection. Included in Ex. 22.
221	Jan. 14-15, 2020 e-mail string Hanson-Gelser	This is mislabeled and is an email string between Hanson and Knieling. No objection. Also Ex. 31.
222	Feb. 7-12, 2020 text string Hanson-Vanderhart	Objection. This is a 93 page document with an enormous amount of hearsay and it more prejudicial than probative. Fed. R. Evid. 403, 802. Dirk Vanderhart is not listed as a witness in this case and the left portion of the messages purport to be his, but are hearsay. Fed. R. Evid. 802. Additionally there are references irrelevant to this case that could be confusing to the jury. For example, there is a discussion of a person named Meredith who is unrelated to this case and not a reference to Meredith Holley, one of Plaintiff’s attorneys. There are a number of references to hearsay statements from others including a BOLI investigator, Plaintiff’s attorneys, and Defendant’s own witnesses. Fed. R. Evid. 802. To the extent Plaintiff discusses her experiences, these texts are cumulative of her testimony and should be excluded under Fed. R. Evid. 403.
223	Jan. 29, 2020 Sandmeyer to Hanson e-mail	No objection. Also Ex. 30.

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224	July 14, 2020 Nordlund to Holley e-mail re hearing	No objection.
225	Oct. 7, 2020 Gelser Blouin to Hanson removal from service memo	No objection. Also Ex. 37.
228	Nov. 6, 2020 Secretary of State filing	No objection.
229	Hanson pay record	No objection.
230	Job hunt materials	No objection.
231	Dec. 16, 2020 Employment Dept. job offer	No objection.
232	Dec. 17, 2020 revised Employment Department job offer	No objection.
233	June 24, 2021 Employment Department job extension	No objection
234	Merry Christmas Sarah Holiday note	No objection. Also Ex. 13.
235	Position Description LA-1	No objection. Also Ex. 1.
236	Dec. 18-19, 2019 e-mail string Hanson-Gelser	No objection. Also Ex. 9. Plaintiff agrees the Daily Memo exhibits should be offered in color.
237	July 26, 2019 e-mail string Gelser-Hanson	Objection. This appears to be offered as impermissible character evidence under Fed. R. Evid. 404 for reasons described in other exhibits above.
238	Jan. 9, 2019 e-mail string Gelser-Hanson	Objection. This email appears to be irrelevant to this case. Fed. R. Evid. 401.
239	Jan 10, 2023 Hanson-Hoeye e-mail	No objection to the full content of this email, but it should be fully provided. The

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		top of the first email appears to be cut off. Fed. R. Evid. 106.
240	Templates for work product	Objection. This exhibit appears to be an irrelevant calendar event. Fed. R. Evid. 401. This case is not about any confusion over scheduling calendar events and making it so would tend to waste time and confuse the jury. Fed. R. Evid. 403.
241	Dec. 30, 2019 e-mail Hanson to Gelser	No objection.
242	Dec. 30, 2019 "Welcome back" e-mail Gelser to Hanson	No objection.
245	[G-B Exh 45] notes on Hanson work schedule	No objection.
250	2023 House Bill 2619	Objection. Irrelevant under Fed. R. Evid. 401. This would confuse the jury and is not at issue in this case. Fed. R. Evid. 403.
251	ORS 192.005	Objection. This exhibit would tend to instruct the jury about laws that are not the laws the jury needs in order to decide the facts of the case itself. This tends to be more confusing than probative. Fed. R. Evid. 403. It is also not relevant. Fed. R. Evid. 401.
264	[Pham Exh 64] Ye memo re Hanson deficiencies	No objection.
265	[Canning Exh 65] memo re Hanson deficiencies	Objection. This is cumulative of other evidence. Ms. Canning testified that she met Plaintiff only twice, making this letter not credible and more prejudicial than probative of any matter. Fed. R. Evid. 403.
267	[Pham Exh 67] Jan. 25, 2023 termination letter	No objection. Also Ex. 51.

EX. NO.	EXHIBIT DESCRIPTION	OBJECTION
268	Hanson ADA request unfilled out	No objection.
269	[Hanson MSJ Dec. Exh. 9] Jan. 2, 2020 Hanson e-mail	Objection. Cumulative of Ex. 218. Also Ex. 17.
270	[Baumgart Dep. Exh. 21] Baumgart Investigative Report	No objection. Also Ex. 53, except that 53 also includes the redacted version from the Committee hearing.

Defendant has not listed any impeachment exhibits as required by the Court's Trial Management Order (ECF No. 59). To the extent Defendant intends to offer impeachment exhibits, Plaintiff reserves the right to object to those exhibits.

Submitted this 25th Day of April, 2024.

/s/ Rebecca Cambreleng

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## **CERTIFICATE OF SERVICE**

I certify that on April 25, 2024, I served the foregoing **PLAINTIFF'S OBJECTIONS TO DEFENDANT'S EXHIBITS** upon the parties hereto via electronic means through the Court's Case Management/Electronic Case File system and via electronic mail:

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